## **EXHIBIT B**

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12	Attorneys for Plaintiffs BEAUMONT RV, INC.		
13	UNITED STATES DISTRICT COURT		
14	EASTERN DISTRICT OF CALIFORNIA		
15	* * *		
16	BEAUMONT RV, INC.,	) Case No. 1:22-CV-00073-AWI-HBK	
17	a California Corporation,	) DECLARATION OF MARK D. MILLER	
18	Plaintiff,	<ul><li>IN SUPPORT OF PLAINTIFF'S</li><li>MOTION FOR ADMINISTRATIVE</li></ul>	
	v.	) RELIEF TO ALLOW LATE FILING OF	
19	CARBON EMERY RV, INC., a Utah	) PAPERS IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS	
20	Corporation.	}	
21	Defendant.	}	
22		Complaint Filed: January 17, 2022	
23			
24	I, Mark D. Miller, declare:		
25		by liganized to mugatica before all of the counts of the	
26	1. I am an attorney at law duly licensed to practice before all of the courts of the		
27	state of California and before this District, and am a member of the law firm of Sierra IP Law		
28	PC, attorneys for plaintiff BEAUMONT R	V, INC. ("Beaumont").	
20		1	
		1	

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2.	On March 21, 2022, I received a copy of Defendant's Motion to Dismiss, which	
was scheduled f	for hearing on April 25, 2022. Based on the hearing date, I believed that the date	
for filing any opposition was April 11, 2022, which was fourteen (14) days before the hearing		
date. This was based on the language of the earlier version of Local Rule 230(c).		
3 (	On April 5, 2022, I learned for the first time that Local Rule 230(c) had changed,	

3 On April 5, 2022, I learned for the first time that Local Rule 230(c) had changed, and that the deadline for filing the opposition was actually fourteen (14) days after the filing date of the Motion to Dismiss, which would have been April 4, 2022. I was unaware of the change in Local Rule 230(c) before April 5, and only then realized that we had inadvertently calendared the wrong response date.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and that this declaration was executed this 6th day of April, 2022, at Fresno, California.

/s/ *Mark D. Miller* Mark D. Miller

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